

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CAVLAM BUSINESS LTD. and JEAN MAURICE  
BERGERON,

08 CV 2225 (JGK)

Plaintiffs,

-against-

CERTAIN UNDERWRITERS AT LLOYD'S,  
LONDON,

Defendant.

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DECLARATION OF  
JULIAN PROWSE BOSWORTH  
IN SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS

I, Julian Prowse Bosworth, declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, as follows:

1. I am the Claims Director of Underwriting Risk Services Ltd. ("URS"). I submit this affidavit in support of the defendants' motion to dismiss.

2. The Underwriter defendants in this case consist of six syndicates at Lloyd's who subscribed to the policy covering the AMIRA, which was underwritten through Yachtsure (now known as Underwriting Risk Services Ltd.) in London.

3. The Corporation of Lloyd's (often referred to as "Lloyd's") is not an underwriting entity and has nothing to do with this case; rather, it is a marketplace, akin to the New York Stock Exchange, which provides support and administrative services for the underwriting syndicates at Lloyd's.

4. All of the underwriting syndicates at Lloyd's, including the six syndicates in this case which insured the AMIRA, conduct their business from London.

5. None of them undertake the activity ascribed to "Lloyd's" in plaintiffs' Opposition papers. (Plaintiffs' Opp. at 10-11; Rowin Opp. Aff., Ex. D, ¶ 5.) That activity is undertaken by the Corporation of Lloyd's, which is not a party to this action.

I declare, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on the 25<sup>th</sup> day of July, 2008.



JULIAN PROWSE BOSWORTH

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